

# Daniel H. Goldman

Attorney & Counselor at Law

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April 18, 2022

**VIA EMAIL AND FIRST-CLASS MAIL**

Matthew E. Kelley  
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**RE: Jeremy Corbin v. Sonya Movassaghi, DMD, et al (USDC-WDVA 6:22-CV-12)**

Dear Mr. Kelley:

We have received your request for an expert witness certification under Va. Code § 8.01-20.1. Our position is that the statute is inapplicable to this action pursuant to Pledger v. Lynch, 5 F.4<sup>th</sup> 511 (4<sup>th</sup> Cir. 2021). Please let me know if you would like to discuss the matter further.

Kind regards,

*Daniel Goldman*

Daniel H. Goldman  
*Counsel for Jeremy Corbin*

c: Evan M. Goldberg, Esq. (via Email)

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